

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, et al.,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

MOTION FOR *PRO HAC VICE* ADMISSION OF RAYMOND P. TOLENTINO

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court, and counsel of record in the instant proceeding, hereby moves the Court for the admission of Raymond P. Tolentino, Esq. to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Mr. Tolentino is an attorney with Kaplan Hecker & Fink LLP, 350 Fifth Avenue, 63rd Floor, New York, NY 10118, Tel: (212) 763-0883, Email: rtolentino@kaplanhecker.com.

2. Mr. Tolentino is qualified and licensed to practice law and is a bar member in good standing in the State of New York (Registration No. 5162425 – Date of Admission: July 16, 2016) and the District of Columbia (Registration No. 1028781 – Date of Admission: October 5, 2015). He is also a bar member in good standing with the United States District Court for the Eastern District of New York (Date of Admission: Jan. 23, 2015), the United States District Court for the Southern District of New York (Date of Admission: July 7, 2020), the United States District Court for the Western District of Michigan (Date of Admission: Jun.

10, 2020), the United States District Court for the District of Columbia (Date of Admission: December 7, 2020), as well as the United States Courts of Appeals for the Second, Third, Fourth, Fifth, Sixth, Seventh, Ninth, Eleventh, D.C., and Federal Circuits.

3. Mr. Tolentino agrees to submit to and comply with the appropriate rules of procedure as required in the case for which he is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Raymond P. Tolentino, Esq. to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: October 7, 2021

Respectfully submitted,

/s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further certify that on October 7, 2021, I also served the foregoing upon following non-ECF *pro se* defendants and participants, via electronic mail or First Class U.S. Mail, as follows:

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**VIA U.S. Mail (to be re-served upon knowledge of
Mr. Cantwell's new Virginia location)**

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/s/ Robert T. Cahill
Robert T. Cahill